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FILED/ACCEPTED

APR 19 2007

Federal CommunicationsCommission
Office of the Secretary

**EX PARTE** 

April 19, 2007

Ms. Marlene H. Dortch Secretary Federal Communications Commission 445 12th Street, **S.W.** Washington, DC 20554

Re: Section 272(f)(l) Su 21 of th BOC Separate Affilia and Related Requirements, WC Docket No. 02-112

Dear Ms. Dortch:

This letter supplements Verizon's March 27,2007 response to specifications 4 and 5 of the Commission's March 13 information request.

The attached Exhibit 4.5 provides additional data from Harte-Hanks. Like the Harte-Hanks data that Verizon previously submitted, these additional data set forth the percentage of customer sites at which a carrier is *a* provider for the following product segments: T-1, T-3, Frame Relay, ATM, Long-Distance, and VPN. These data are presented for each of the 28 states in which Verizon provides local wireline telephone service plus the District of Columbia; within each individual state data are provided separately for Verizon's in-franchise service territory and out-of-franchise territory. These new data provide a more granular breakdown of business sites, dividing them into four categories: 0 to 4 site employees, 5 to 19 site employees, 20 to 249 site employees, and 250+ site employees.

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Staff asked for clarification regarding Verizon's April 12,2007 supplemental response to specification 5 of the Commission's March 13 information request. Verizon developed its estimates of total market revenue for each product category using a variety of sources. As a starting point, Verizon identified independent market research firms' estimates of U.S. domestic business customer telecommunications revenue by service category, such as frame relay, private line, or long distance voice. Verizon then reviewed each source for reasonableness. and reconciled the sources for differences in service definition. The next step was to calculate the average of the market research firms' estimates. By averaging data from a number of different vendors. Verizon was able to reduce individual analyst or reporting bias. The market size figures that Verizon has provided to the Commission reflect data from at least three market research firms. **As** a further check on the reasonableness of the revenue estimates by service, Verizon compared the sum of the service-specific estimates against estimates of total industry revenues from broker analyst reports and company earnings reports.

Exhibit 4.5 contains Highly Confidential Information and has been marked "HIGHLY CONFIDENTIAL INFORMATION - SUBJECT TO SECOND PROTECTIVE ORDER IN WC DOCKET NO. 02-112 BEFORE THE FEDERAL COMMUNICATIONS COMMISSION" in accordance with the Second Protective Order in this proceeding.'

If you have any questions, please call me at 202-515-2467.

Very truly yours,

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Enclosure

<sup>&</sup>lt;sup>1</sup> Section 272(f)(1) Sunset ← the BOC Separate Affiliate and Related Requirements, Second Protective Order, WC Docket No. 02-112, DA 07-1389 (rel. Mar. 23,2007).

## EXHIBIT 4.5

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